

Date of Hearing: June 30, 2021

ASSEMBLY COMMITTEE ON LOCAL GOVERNMENT

Cecilia Aguiar-Curry, Chair

SB 403 (Gonzalez) – As Amended June 8, 2021

SENATE VOTE: 27-7

SUBJECT: Drinking water: consolidation.

SUMMARY: Allows the State Water Resources Control Board (state board) to order consolidations of at-risk systems and at-risk domestic wells. Specifically, **this bill:**

- 1) Defines the following terms:
 - a) “At-risk domestic wells” as domestic wells that serve a disadvantaged community and are at risk of consistently failing to provide an adequate supply of safe drinking water as determined by the state board pursuant to the methodology established in the 2021 Drinking Water Needs Assessment, as specified, or a substantially similar methodology adopted by the state board in an update to the Drinking Water Needs Assessment.
 - b) “At-risk water system” means a water system that meets all the following conditions:
 - i) The water system is either a public water system with 3,300 or fewer connections or a state small water system.
 - ii) The system serves a disadvantaged community.
 - iii) The system is at risk of consistently failing to provide an adequate supply of safe drinking water, as determined by the state board pursuant to the methodology established in the 2021 Drinking Water Needs Assessment, as specified, or substantially similar methodology adopted by the state board in an update to the Drinking water Needs Assessment.
- 2) Requires the state board, when ordering consolidation with a receiving water system, to consult with, and fully consider input from, any groundwater sustainability agency in a basin that provides groundwater supply, in whole or in part, to the affected area.
- 3) Specifies that if the potentially subsumed water system to be consolidated into the receiving water system is an at-risk water system, the state board shall do all of the following:
 - a) Conduct outreach to ratepayers and residents served by the at-risk water system, including identifiable local community groups. These outreach efforts shall gauge community support for consolidation of the at-risk water system. The state board shall consider the results of this outreach when deciding whether to order consolidation of the at-risk water system.
 - b) Consider any petition submitted by members of a disadvantaged community served by the at-risk water system.

- c) If the potentially subsumed water system contends during the initial written comment period that it is not an at-risk water system, the state board shall consider during a public meeting any information provided by the potentially subsumed water system in support of its contention that it is not an at-risk water system.
 - d) The state board shall make reasonable efforts to provide a 30-day notice of the public meeting to the ratepayers, renters, and property owners to receive water service through service extension or those in the area of the subsumed water system and all affected local government agencies and drinking water service providers.
- 4) Requires a finding that a disadvantaged community, in whole or in part, is substantially reliant on at-risk domestic wells to be based on specified maps and inspection or testing of the domestic wells.
 - 5) Authorizes the state board to prioritize consolidation of an at-risk water system that has historically been overburdened by pollution and industrial development or faced other environmental justice hurdles.

EXISTING LAW:

- 1) Pursuant to the federal Safe Drinking Water Act (SDWA), authorizes the United States Environmental Protection Agency (US EPA) to set standards for drinking water quality and to oversee the states, localities, and water suppliers who implement those standards.
- 2) Declares that it is the established policy of the state that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes.
- 3) Requires, pursuant to the California SDWA, the state board to regulate drinking water and to enforce the federal SDWA and other regulations.
- 4) Defines "public water system" as a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year.
- 5) Defines "state small water system" as a system for the provision of piped water to the public for human consumption that serves at least five, but not more than 14, service connections and does not regularly serve drinking water to more than an average of 25 individuals daily for more than 60 days out of the year.
- 6) Defines "domestic well" as a groundwater well used to supply water for the domestic needs of an individual residence or a water system that is not a public water system and that has no more than four service connections.
- 7) Requires the state board, in administering SDWA programs to fund improvements and expansions of small community water systems, to encourage the consolidation of small community water systems that serve disadvantaged communities; and, to prioritize funding for construction projects that involve the physical restructuring of two or more community

water systems, at least one of which is a small community water system that serves a disadvantaged community, into a single, consolidated system.

- 8) Authorizes the state board, where a public water system or a state small water system serving a disadvantaged community consistently fails to provide an adequate supply of safe drinking water or where a disadvantaged community is reliant on a domestic well that consistently fails to provide an adequate supply of safe drinking water, to order consolidation, either physical or operational, with a receiving water system.
- 9) Requires the state board to develop and adopt a policy that provides a process by which members of a disadvantaged community may petition the state board to consider ordering consolidation.
- 10) Requires the state board, before ordering consolidation or extension of service, to perform a series of activities, including: encouraging voluntary consolidation or extension of service; considering other enforcement remedies; consulting with the relevant local agency formation commission (LAFCO); notifying the potentially receiving water system and the potentially subsumed water systems; holding at least one public meeting at the initiation of this process in a place as close as feasible to the affected areas; and, providing the opportunity for public comment.
- 11) Requires the state board, before ordering consolidation or extension of service, to make seven findings, including: that the potentially subsumed water system has consistently failed to provide an adequate supply of safe drinking water; that all reasonable efforts to negotiate consolidation or extension of service were made; and, that consolidation of the receiving water system and subsumed water system or extension of service is appropriate and technically and economically feasible.
- 12) Authorizes the state board, in order to provide an adequate supply of affordable, safe drinking water to disadvantaged communities and to prevent fraud, waste, and abuse, to, if sufficient funding is available, contract with, or provide a grant to, an administrator to provide administrative, technical, operational, or managerial services, or any combination of those services, to a designated water system to assist the designated water system with the provision of an adequate supply of affordable, safe drinking water.
- 13) Authorizes the state board to order the designated water system to accept administrative, technical, operational, or managerial services from an administrator appointed by the state board for full oversight of construction or development projects related to a consolidation or extension of service, including, but not limited to, accepting loans and grants and entering into contracts on behalf of the designated water system.
- 14) Makes legislative findings that regional solutions to water contamination problems are often more effective, efficient, and economical than solutions designed to address solely the problems of a single small public water system, and that it is in the interest of the people of the State of California to encourage the consolidation of the management and the facilities of small water systems to enable those systems to better address their water contamination problems.

FISCAL EFFECT: According to the Senate Appropriations Committee, pursuant to Senate Rule 28.8, negligible state costs.

COMMENTS:

- 1) **Human Right to Water.** In 2012, California became the first state to enact a Human Right to Water law [AB 685 (Eng), Chapter 524, Statutes of 2012]. Public policy continues to be focused on the right of every human being to have safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitation. Water supply, contaminants, costs of treatment and distribution systems, the number and nature of small public water systems, especially in disadvantaged communities, and many other factors will continue to challenge progress in addressing the Human Right to Water.
- 2) **Drinking Water Contamination in Disadvantaged Communities.** The February 2018, University of California (UC) Davis report, "*The Struggle for Water Justice in California's San Joaquin Valley: A Focus on Disadvantaged Unincorporated Communities*," summarizes drinking water issues facing disadvantaged communities in California, as follows:

"In California, lack of access to clean, safe, and affordable water is a threat to public health and well-being, and violates the state's newly codified Human Right to Water. In low-income communities located outside city boundaries (known as DUCs), drinking water is often unsafe to drink. In many such localities, drinking water is contaminated by industrial by-products (usually associated with agriculture, oil and gas production, transportation, and manufacturing) and compromised by inadequate wastewater treatment and disposal systems, as well as naturally occurring toxic substances like arsenic and uranium. Many DUC residents in the San Joaquin Valley pay a triple penalty to obtain safe water: they bear the health costs of unsafe drinking water; they purchase that unsafe water at high costs; and, they must also purchase 'substitute' water – typically expensive bottled water – for drinking and cooking.

"Lack of access to clean, safe and affordable drinking water has a racial and ethnic component: the vast majority of DUC residents are people of color who also face cumulative impacts from environmental contamination brought on by proximity to air pollution, pesticides, toxic facilities and waste disposal. Without city governments to directly represent their interests and provide essential services, residents of DUCs have been systematically deprived of access to important means of democratic governance."

While the 2018 UC Davis report focuses on DUCs in the San Joaquin Valley, the findings are consistent with a more expansive 2013 SWRCB report and 2012 UC Davis report that found that drinking water contamination in California disproportionately affects small, rural, and low-income communities that depend mostly on groundwater as their drinking water source. The 2013 SWRCB report found that 682 community public water systems in California, which serve nearly 21 million people, rely on contaminated groundwater as a primary source of drinking water. It also found that 265 community public water systems, which serve a little more than two million people, had received at least one drinking water quality violation within the last compliance cycle. The report points out that an additional two million Californians rely on groundwater from a private domestic well or a smaller groundwater-reliant system that is not regulated by the state. The SWRCB reports that

currently approximately 330 drinking water systems are not in compliance with drinking water standards.

The 2018 UC Davis report also found that a significant number of DUC residents live close to an existing, and water quality compliant, community water system that could provide them with clean drinking water.

- 3) **Addressing Service Deficiencies.** LAFCOs, along with the planning agencies of cities and counties, are charged with ensuring that services are effectively and efficiently delivered to all communities throughout the state. Nevertheless, some communities continue to lack adequate public services, including safe drinking water and functioning wastewater systems, often due to their low-income status. In some cases, these disadvantaged communities are contained within a city but lack adequate water and wastewater services. In other cases, these communities are located in unincorporated areas. These DUCs can be remote and far from other communities with better public services, but at other times, they are adjacent to a city, special district, or county service area that provides water or wastewater services.

In recent years, the Legislature has taken several steps to try to address some of the service problems experienced by DUCs. SB 244 (Wolk), Chapter 513, Statutes of 2011, aimed to prevent cities from carving out DUCs by generally prohibiting annexations of small areas to a city if a DUC is contiguous with that area. SB 244 also required LAFCOs to include in the municipal service review (MSR) a description of the location and characteristics of any DUCs within or contiguous to the sphere of influence and to consider the water, sewer, or fire protection needs of DUCs within the sphere when considering updates. Finally, SB 244 required cities and counties to review the water and fire service needs of DUCs in their general plans. SB 244 made it easier for LAFCOs to identify boundary changes and governmental reorganizations necessary to fix water and sewer service problems faced by disadvantaged communities.

- 4) **Consolidations.** Subsequent legislation, SB 88 (Committee on Budget and Fiscal Review), Chapter 27, Statutes of 2015, took this effort a step further by authorizing SWRCB to order a consolidation of neighboring drinking water systems where it is economically feasible in order to address public health threats. SB 88 established a process for consolidating water systems that requires multiple public hearings, as well as consultations with affected entities, such as the water system being subsumed, the receiving water system, domestic well owners, and the local government with land use authority over the area, and the LAFCO.

Before ordering consolidation or extension of service, SWRCB must also encourage voluntary consolidations or extension of service, consider other enforcement remedies, obtain written consent from any domestic well owner, and provide technical assistance to both systems. The SWRCB must also make a series of findings, including that:

- a) Consolidation or extension of service is the most effective and cost-effective means to provide an adequate supply of safe drinking water; and,
- b) The capacity of the proposed interconnection needed to accomplish the consolidation is limited to serving the current customers of the subsumed water system.

Under SB 88, SWRCB must pay the full cost of the new capacity, including replacing any capacity lost as a result of the consolidation or extension of service, providing additional capacity needed as a result of the consolidation or extension of service, and legal fees. The SWRCB must also pay the LAFCO's costs and fees, adequately compensate the owners of any privately owned subsumed water system, and coordinate with the appropriate LAFCO and other relevant local agencies to facilitate the change of organization or reorganization. SB 88 also prohibited the consolidated water system from increasing charges on existing customers of the receiving water system solely as a consequence of the consolidation or extension of service, unless the customers receive a corresponding benefit.

The following year, SB 552 (Wolk), Chapter 773, Statutes of 2016, gave the state board another tool to address the systemic issues affecting public water systems serving small, disadvantaged communities. SB 552 authorizes the state board to identify public water systems that are consistently unable to provide an adequate and affordable supply of safe drinking water and, once funding is available, to then contract with a competent administrator to provide managerial and technical expertise to that system.

AB 2501 (Chu), Chapter 871, Statutes of 2018, next required the state board to develop and adopt a policy that provides a process by which members of a disadvantaged community may petition the state board to consider ordering consolidation and authorized the state board to use its SB 88 authority to consolidate a disadvantaged community that is reliant on a domestic well that consistently fails to provide an adequate supply of safe drinking water. AB 2501 also revised various provisions established by SB 88 and SB 552, including provisions that require the state board to pay for infrastructure needed and capacity lost as part of a consolidation. Finally, AB 508 (Chu), Chapter 352, Statutes of 2019, subsequently required the state board to develop the petition process no later than July 1, 2020.

To date, the state board has completed two mandatory consolidations and initiated an additional 17 mandatory consolidations, including eight that are now pursuing consolidations voluntarily and two for which the state board halted the consolidation. The state board has also issued numerous informal consolidation letters indicating the state board's intent to initiate consolidation, which has encouraged additional voluntary consolidations.

- 5) **Needs Assessment.** In 2019, to advance the goals of the Human Right to Water, the Legislature enacted SB 200 (Monning), Chapter 120, Statutes of 2019, which directed the state board to establish the SAFER Program and created the Safe and Affordable Drinking Water Fund (Fund). The Fund provides up to \$130 million per year through 2030 to enable the state board to develop and implement sustainable solutions for underperforming drinking water systems. The annual Fund Expenditure Plan prioritizes projects for funding, documents past and planned expenditures, and must be based on data and analysis drawn from an annual drinking water Needs Assessment.

The Fund Expenditure Plan must prioritize funding for:

- a) Assisting disadvantaged communities served by a public water system, and low-income households served by a state small water system or a domestic well.

- b) The consolidation or extension of service, when feasible, and administrative and managerial contracts or grants entered into pursuant to SB 552, where applicable.
- c) Funding costs other than those related to capital construction costs, except for capital construction costs associated with consolidation and service extension to reduce the ongoing unit cost of service and to increase sustainability of drinking water infrastructure and service delivery.

The state board released its 2021 Needs Assessment on April 9th, 2021, which:

- a) Identifies state small water systems and domestic wells that are failing or at risk of failing to provide access to safe drinking water.
- b) Estimates the cost of interim and long-term solutions for these systems.
- c) Determines the statewide funding gap and affordability challenges that may be barriers to implementing these solutions.

To identify the state small systems and domestic wells that are failing or at risk of failing to provide access to safe drinking water, the 2021 Needs Assessment includes a risk assessment that evaluated 2,779 public water systems based on a methodology that measures water system performance on 19 risk indicators within four categories: water quality; accessibility; affordability; and technical, managerial, and financial (TMF) capacity. Because smaller systems are significantly more likely to be underperforming, the risk assessment limited its review of public water systems to those systems with 3,300 or fewer connections and K-12 schools.

The risk assessment also modeled risk for 1,463 small water systems and over 325,000 domestic wells. Because the state does not collect data on water quality from domestic wells or state small water systems, the risk assessment methodology used measures of ambient groundwater quality to estimate whether a domestic well or state small water system is at risk of failing to consistently provide safe drinking water. The risk assessment identified 611 at-risk state small systems and nearly 78,000 at-risk domestic wells.

- 6) **LAFCO.** LAFCOs are responsible for coordinating logical and timely changes in local governmental boundaries, conducting special studies that review ways to reorganize, simplify, and streamline governmental structures, and preparing a sphere of influence for each city and special district within each county. The courts refer to LAFCOs as the Legislature's "watchdog" over local boundary changes. LAFCO law establishes procedures for local government changes of organization, including special district consolidations. LAFCOs regulate boundary changes through the approval or denial of proposals by other public agencies or individuals for these procedures.

The process for most boundary changes and agency formations requires numerous steps:

- a) Application to LAFCO, by petition or resolution, for an environmental review, property tax exchange agreement, and a plan for services that describe what services will be provided and how the services will be financed.

- b) Noticed public hearing, testimony, and approval or disapproval by LAFCO in which LAFCO can impose terms and conditions.
- c) Additional public hearing for protests. If a majority of the city's voters file protest, the disincorporation stops, and if not, LAFCO must order an election on the proposed disincorporation.
- d) If existing law requires it, an election that requires a majority vote approval.

LAFCO staff files documents to complete the reorganization. LAFCOs are required to approve district consolidations where each merging district passes a resolution endorsing the consolidation, but provisions that govern protest and elections still apply.

- 7) **Bill Summary.** This bill would authorize the state board to also order consolidation where a water system serving a disadvantaged community is an at-risk water system or where a disadvantaged community is substantially reliant on at-risk domestic wells. This bill would require the state board, before ordering consolidation or extension of service, to consult with any groundwater sustainability agency, as defined, that provides groundwater supply to the affected area.

Additionally, this bill would require the state board to conduct outreach to ratepayers and residents served by an at-risk water system, consider any specified petitions submitted by members of a disadvantaged community served by the at-risk water system, and consider any information provided by the potentially subsumed water system in support of its contention that it is not an at-risk water system before ordering the consolidation of the at-risk water system. Lastly, this bill would authorize the state board to prioritize consolidation of an at-risk water system that has historically been overburdened by pollution and industrial development or faced other environmental justice hurdles. Clean Water Action, Community Water Center, and the Leadership Counsel for Justice and Accountability are the sponsors of this bill.

- 8) **Author's Statement.** According to the author, "Many disadvantaged communities throughout California are saddled with a legacy of environmental justice challenges, including hundreds of communities that lack reliable access to safe, clean, and affordable drinking water. Whether it be manganese and lead in the drinking water of the communities of South East Los Angeles or the arsenic, nitrates, and Chromium-6 that plague the taps of communities in the Central Valley, these Californians deserve to have the human right to safe drinking water finally realized.

"Consolidation of water systems and the extension of service to at-risk domestic wells is an important and effective tool to improve access to safe and affordable drinking water, because larger consolidated systems are generally more reliable, safe, and efficient. State water authorities, however, are restricted to using consolidation as a tool only after a water system has already failed and is providing unsafe drinking water to its residents. Waiting until a system fails before taking actions makes no sense.

"SB 403 provides a proactive and preventative solution that will allow the State Water Board to pursue consolidation for a water system that serves a disadvantaged system and that is 'at-risk' of failing. The bill would additionally require the State Water Board to follow the

existing SB 88 consolidation process to seek and consider community input through public hearings before ordering consolidation, and to consider whether the residents served by the at-risk water system have filed a petition for mandatory consolidation.”

9) **Policy Considerations.** The Committee may wish to consider the following:

- a) **Local Problems, Local Solutions.** LAFCO law currently authorizes the formation, dissolution, consolidation, or merger of local agencies through a deliberate, public process conducted at the local level. The Legislature has delegated an important power to LAFCOs: the ability to control local boundaries. Implicit in this decision was that the local officials that make up LAFCO boards have better knowledge of conditions on the ground than anyone at the state level. In recent years, however, the Legislature has adopted a number of measures that have lessened the role of LAFCOs and other local agencies in addressing water service deficiencies, and instead vested that power with the state board. Concerns have been raised that the authority given to the state board to consolidate at-risk water systems reduces the role of local officials, and the voters that elected them, even further. In light of these concerns, the Committee may wish to consider if further state intervention in local water delivery decisions is prudent or if the existing tools at the local level should instead be strengthened.
- b) **Receiving System Input.** Concerns have been raised that the receiving water system does not have enough input during the process of state board mandated consolidation with “at-risk” water systems. The Association of California Water Agencies (ACWA) writes, “The Author has agreed that some new public process steps are appropriate in the context of ‘at-risk’ systems. These process steps are important – for example, they would help reserve Safe and Affordable Drinking Water Fund dollars for situations where solutions are actually needed. ACWA has noted that for public water systems and state small systems, the State Water Board process, which was developed for funding assistance purposes, includes many indicators, scores and weights that are used to assess whether a system is ‘at risk.’ In the context of a consolidation order, it is appropriate for the State Water Board to be able to consider information regarding whether or not the potentially subsumed system is truly on the cusp of failing.

“The April 27 and June 8 amendments have made progress in that the bill now proposes that the potentially subsumed water system could provide comments that the system is not ‘at risk.’ If the system did so, the State Water Board would be required to consider during a public meeting information provided by the potentially subsumed water agency to that effect. These provisions should include the same process steps for the potentially receiving system (which would be significantly impacted by the action).”

The Committee may wish to consider if the existing opportunities for a receiving system to provide input is sufficient or if additional opportunities are needed.

10) **Committee Amendments.** In order to respond to the concerns that have been raised, the Committee may wish to amend this bill in the following ways:

- a) HSC 116682 (b)(6) Consult with, and fully consider input from, *the potentially receiving water system and* all public water systems in the chain of distribution of the potentially receiving water systems. *The input from the potentially receiving water system may include, but is not limited to, information related to the classification of the potentially*

subsumed water system as an at-risk water system or a state small water system or of at-risk domestic wells.

- b) HSC 116682 (k) A finding that a disadvantaged community, in whole or in part, is substantially reliant on at-risk domestic wells shall be based on the maps created pursuant to paragraph (1) of subdivision (a) of Section 116772 and inspection or testing of the domestic wells *showing an imminent risk of failing to provide an adequate supply of safe drinking water.*

11) **Arguments in Support.** A coalition of supporters argue that, “SB 403 builds on SB 88 (2015) by allowing the State Water Board to mandate consolidation where domestic wells or a water system with 3,300 or fewer connections that serves a disadvantaged community is ‘at risk’ of failure, as defined. Current law does not allow the State Water Board to act proactively to prevent water systems from failing. The bill would allow the State Water Board to act to prevent public health emergencies and ensure efficient use of local and state resources.

“By extending the State Water Board’s authority to mandate and facilitate consolidation of at risk systems serving disadvantaged communities, the bill would improve water system sustainability, drinking water quality, affordability, and trust in tap water. Water system consolidation is an important and effective tool to improve access to safe and affordable water because larger consolidated systems are generally more reliable, safe, and efficient. Small water systems are far more likely to have water quality violations and higher water rates than larger systems.

“SB 403 would require that the State Water Board seek and meaningfully consider community input before ordering consolidation. It also requires the State Water Board to consider any petition for mandatory consolidation submitted by members of the disadvantaged community served by the at-risk water system. Importantly, it allows the at-risk water system the opportunity to provide evidence at a public meeting before the State Water Board if its governing body does not believe it is at risk of failure.”

12) **Arguments in Opposition.** The California Special Districts Association writes, “While we applaud the intent of the measure and share the goal of reliable, safe drinking water for all Californians, SB 403 has deficiencies that must be addressed. The vast majority, 1,074 out of 1,152, of the at-risk and potentially at-risk water systems identified by the SWRCB are not water districts, rather they are other types of entities including privately owned water systems. Of those 617 public water systems listed as at-risk and subject to the provisions of SB 403, only 39 are water districts. Unlike privately owned water systems, water districts are public agencies with elected boards that must follow the Brown Act, Public Records Act, public bidding, prevailing wage, and other transparency and accountability requirements. The residents served by water districts are the ones who established the district and who own the district infrastructure and water rights. Local voters elected the water district’s board members to govern their district. These board members pay the same rates and drink the same water as the people they represent.

“In the case of public agencies with elected boards, a democratic process exists through the Cortese- Knox-Hertzberg Act to address their challenges in a way that respects the rights of local voters. This process involves working through the open and transparent Local Agency

Formation Commission (LAFCO), which has authority over the organization of public agencies. While LAFCO's do not have authority over public water systems that are privately held, they can re-organize those that are public and accountable to the voter. Using this existing process, we ask the State to help empower the community to maintain ownership and governance of its water system, not to take it away through an unelected state bureaucracy."

ACWA argues that, "The proposed authority for the State Water Board to order the consolidation of at-risk domestic wells should be deleted because it is premature. First, the State Water Board is just starting to implement the recently added existing authority for consolidation of domestic wells in disadvantaged communities that are consistently failing to provide an adequate supply of safe drinking water...Data and methodologies in this area will improve over time. But the current 'at-risk' methodology/mapping for private domestic wells should not be the basis of consolidation orders..."

"The Author did include in subdivision (k) of Section 116682 language that would require that there be inspection or testing of the wells for wells to be considered for consolidation under this proposed law. While that is a step in the right direction, the language does not set forth what testing or monitoring results would indicate that the wells are actually at risk of failing to provide an adequate supply of drinking water, and that is a complicated issue."

13) **Double-Referral.** This bill is double-referred to the Environmental Safety and Toxic Materials Committee, where it passed on a 6-3 vote on June 16, 2021.

REGISTERED SUPPORT / OPPOSITION:

Support

Clean Water Action [SPONSOR]
Community Water Center [SPONSOR]
Leadership Counsel for Justice and Accountability [SPONSOR]
Alliance of Nurses for Healthy Environments
American Rivers
California Catholic Conference
California Coastkeeper Alliance
California League of Conservation Voters
Carbon Cycle Institute
Ceres
Environmental Law Foundation
Environmental Working Group
Friends Committee on Legislation of California
Martin Luther King Jr. Freedom Center
Natural Resources Defense Council
NextGen California
Physicians for Social Responsibility, San Francisco Bay Area Chapter
Pueblo Unido CDC
Sierra Club California
Western Center on Law and Poverty

Opposition

Association of California Water Agencies (unless amended)
Brooktrails Township Community Services District (unless amended)
California Special Districts Association (unless amended)
Casitas Municipal Water District
Grizzly Flats Community Services District (unless amended)
Orange County LAFCO (unless amended)

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